



A SUBSIDIARY OF NATIONAL UTILITIES &amp; INDUSTRIES

ONE ELIZABETHTOWN PLAZA • ELIZABETH, NEW JERSEY 07207 • (201) 289-5000

September 19, 1983

Hon. William D. Ruckleshaus  
Administrator  
U.S. Environmental Protection Agency  
401 M Street, SW  
Washington, DC 20460

Dear Mr. Ruckleshaus:

Pursuant to the Comprehensive Environmental Response, Compensation and Liability Act, notice is hereby given of the potential existence of substances that may be "hazardous", within the definition reflected in 40 C.F.R. §300.6, on land owned now or in the past by the Elizabethtown Gas Company ("Elizabethtown").

Elizabethtown has become aware that facilities formerly used for the manufacture of low-Btu "town gas" from coal by the gas industry may, as a class, present hazardous waste questions. On August 22, 1983, Elizabethtown received from the New Jersey Department of Environmental Protection ("NJDEP") a request for information on eight properties, which are assumed to be former gas manufacturing facilities, including a designation of the operations thereon and the waste disposal methods utilized at the plants. We understand that NJDEP sent letters requesting information on other similar sites to other New Jersey gas utilities.

Our information at this point is very incomplete and we are gathering more, in cooperation with NJDEP. Activity at some of the sites stopped over 80 years ago and some data may be unavailable. In some cases we do not even know whether coal gasification processes were ever carried on at the site. In several cases, previous owners conducted any activities that may have occurred. In at least four cases Elizabethtown purchased the natural gas properties, directly or indirectly from Jersey Central Power & Light Company ("JCPL").

43

MD 980781157 ZIP CODE 07206  
Third Avenue and Florida Street

- WA 982187338 ZIP CODE 07202

1. NJ 982187346 ZIP CODE 08822

- NJ 982187346 ZIP CODE 08822  
 Lemington, NJ - Was operated as a coal

Elizabethtown:  
WA982187353 217 CODE 07860

- WD982187353 217 CODE 07860  
on, NJ - Was operated by JCPL as a coal

owned by Elizabethtown:  
NJ 09821 87361 ZIP CODE 08861

5. Linden, Sadowski, Wisteria Streets, Perth Amboy, NJ - Was operated by Elizabethtown as coal gasification plant prior to 1923; no longer owned. A storage holder was removed and property sold to St. Demetrius Greek Orthodox Church in 1964.

ND98 212 7 379

ZIP CODE 07065

6. Intersection Central, Hamilton and Irving Streets, Rahway, NJ - May have been operated as coal gasification plant prior to 1911 by Elizabethtown or a predecessor. No longer owned by Elizabethtown. The land was sold to the City of Rahway in 1972.

D. Uncertain Whether Gasification Facilities Operated Or By Whom; Property No Longer Owned by Elizabethtown:

ND 982187387

ZIP CODE 08530

7. S. Main Street at Ferry Street, Lambertville, NJ - No longer owned by Elizabethtown. Former site of gas storage facilities. Elizabethtown is currently not sure whether gasification activities ever occurred at this site. It is believed there were no gasification activities after 1912. The storage holder was removed and property sold to Econotech Development Corporation of Bridge and Union Streets, Lambertville, in 1978.

ND 982187395

ZIP CODE 08865

8. Heckman Terrace, Phillipsburg, NJ - Owned by Elizabethtown until 1972, formerly owned by JCPL; Elizabethtown does not believe the site ever was the scene of coal gasification processes though it was a storage area. Was sold in 1972 to Mc Ginley Mills Inc.

E. Gasification Facilities Never Operated by Elizabethtown; Property Never Owned by Elizabethtown:

9. S. Lincoln Street, Washington, DC - May have been a coal gasification site for JCPL or a predecessor around 1870; Elizabethtown and its predecessors never owned this site but a report was made to New Jersey's Board of Public Utilities because the property is within our franchise area.

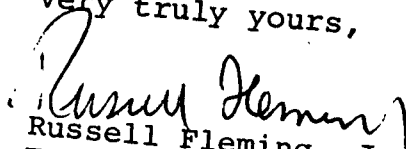
With the exception of number 8, the NJDEP letter referenced all of the sites listed in A through E.

At this point, we have no information concerning the quantity of wastes, if any, that were deposited on these sites. Additionally, we still lack chemical information as to what particular substances may remain at each site. Generically, coal tars were a by-product of coal gas production and purification operations. We do have records of sales of these coal tars to other companies, including Public Service Electric & Gas Company over many years. We assume, though, that some coal tars have been deposited on some of the sites listed, either by Elizabethtown (or its predecessors) or by Jersey Central Power & Light (or its predecessors) and that some coal tar constituents persist on at least some sites.

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We are engaged in a thorough search of corporate and other records to determine what activities took place at what locations on these sites. We shall also retain such outside consulting help as may be needed to assist in chemical and engineering evaluation.

Very truly yours,

  
Russell Fleming, Jr.  
Executive Vice President  
and General Counsel

RFJr:B

cc: Hon. Robert E. Hughey, Commissioner  
New Jersey Department of Environmental Protection

Jacqueline E. Schafer  
Administrator, U.S. EPA Region II  
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Robert Brokaw, Esq.  
Jersey Central Power & Light Co.